

1 JOSEPH W. COTCHETT (Cal. SBN 36324)
jcotchett@cpmlegal.com
2 MARK C. MOLUMPY (Cal. SBN 168009)
mmolumphy@cpmlegal.com
3 ARON K. LIANG (Cal. SBN 228936)
aliang@cpmlegal.com
4 MATTHEW K. EDLING (Cal. SBN: 250940)
medling@cpmlegal.com
5 JENNIFER R. CRUTCHFIELD (Cal. SBN: 275343)
jcrutchfield@cpmlegal.com
6 **COTCHETT, PITRE & McCARTHY, LLP**
7 840 Malcolm Road, Suite 200
8 Burlingame, CA 94010
9 Telephone: (650) 697-6000
Facsimile: (650) 697-0577

10 *Lead Counsel for Plaintiff Stanley Morrical,*
11 *derivatively on behalf of Hewlett-Packard Company*

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**

14
15 IN RE HEWLETT-PACKARD COMPANY
16 SHAREHOLDER DERIVATIVE LITIGATION

17 THIS DOCUMENT RELATES TO:
18 ALL ACTIONS

Master Docket

NO. C-12-6003-CRB

**DECLARATION OF MATTHEW K.
EDLING IN SUPPORT OF
PLAINTIFF'S ADMINISTRATIVE
MOTION TO SEAL DOCUMENTS
PURSUANT TO CIVIL LOCAL
RULES 7-11 AND
79-5(d) AND GENERAL ORDER 62**

22
23
24
25
26
27
28
DECLARATION OF MATTHEW K. EDLING IN SUPPORT OF PLAINTIFF'S ADMIN MOTION
TO SEAL DOCUMENTS PURSUANT TO CIVIL LOCAL RULES 7-11 AND 79-5(d) AND
GENERAL ORDER 62; MASTER DOCKET No. C-12-6003 CRB

1 I, Matthew K. Edling, declare and state as follows:

2 1. I am an attorney at the law firm Cotchett, Pitre & McCarthy, LLP, and Lead
3 Counsel in this case. I submit this declaration pursuant to 28 U.S.C. § 1746 in support of the
4 Administrative Motion to Seal Documents in support of Plaintiff's Administrative Motion to
5 Seal Documents Pursuant to Civil Local Rules 7-11 and 79-5(d) and General Order No. 62.

6 2. This Declaration is based upon my personal knowledge and if called to testify, I
7 could and would do so competently as to the matters set forth herein. I have personal knowledge
8 of these facts set forth below.

9 3. Portions of Plaintiff's Consolidated Shareholder Derivative Complaint
10 "Complaint" contain or refer to information designated by Nominal Defendant Hewlett-Packard
11 Company ("HP") as "Confidential" under a Confidentiality Agreement entered between Lead
12 Plaintiff Stanley Morrical and HP on February 13, 2013 and amended on April 30, 2013.

13 4. Attached as **Exhibit A** is a redacted version of the Complaint. The redacted
14 portions in the Complaint are images of or refer to documents designated confidential by HP
15 pursuant to the above referenced Confidentiality Agreement and amendment. An unredacted
16 copy has been lodged with the Court which contains highlights instead of redactions of the
17 portions of the Complaint designated confidential by HP.

18
19 I declare under penalty of perjury under the laws of the United States that the foregoing is
20 true and correct.

21 Executed this 3rd day of May, 2013 in Burlingame, California.

22
23 /s/ Matthew K. Edling
MATTHEW K. EDLING